

1 Jeffrey L. Hartman, Esq. (NSBN 1607)
2 HARTMAN & HARTMAN
3 510 W. Plumb Lane, Suite B
4 Reno, Nevada 89509
5 Telephone: (775) 324-2800
6 notices@bankruptcyrreno.com

5 Attorney for Christina Lovato,
6 Chapter 7 Trustee

8 Michael R. Hogue, Esq. (NSBN 12400)
9 10845 Griffith Peak Drive, Suite 600
0 GREENBERG TRAURIG, LLP
1 Las Vegas, Nevada 89135
Telephone: (702) 938-6909
hoguem@gtlaw.com

2 | Attorneys for Non-Party Anson Funds
Management LP

Ryan J. Works (NSBN 9224)
Jimmy F. Dahu (NSBN 17061)
McDONALD CARANO LLP
2300 West Sahara Avenue, Suite 1200
Las Vegas, Nevada 89102
Telephone: (702) 873-4100
rworks@mcdonaldcarano.com
jdahu@mcdonaldcarano.com

Attorneys for Non-Party Citadel Securities LLC

Jarrod L. Rickard, Esq. (NSBN 10203)
SEMENZA RICKARD LAW
10161 Park Run Dr., Ste. 150
Las Vegas, Nevada 89145
Telephone: (702) 835-6803
jlr@semenzarickard.com

Attorneys for Non-Party Virtu Financial, LLC

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re
META MATERIALS INC.,
Debtor.

Case No.: 24-50792-hlb
(Chapter 7)

**STIPULATION ON BRIEFING SCHEDULE AND
HEARING DATE FOR NON-PARTIES CITADEL
SECURITIES LLC, ANSON FUNDS
MANAGEMENT LP, AND VIRTU FINANCIAL,
LLC'S MOTION TO QUASH AND/OR FOR A
PROTECTIVE ORDER**

Current Hearing Date: September 4, 2025
Current Hearing Time: 10:00 a.m.

**Proposed Hearing Date: October 30, 2025
Proposed Hearing Time: 10:30 a.m.**

WHEREAS, in relation to the above-captioned bankruptcy proceedings (the “Action”), Chapter 7 Trustee Christina Lovato (“Trustee”) and third-party subpoena respondents Citadel

1 Securities LLC, Anson Funds Management LP, and Virtu Financial, LLC (“Non-Parties”) hereby
2 agree to the following Stipulation and respectfully request that the Court enter the [Proposed]
3 Order Approving Stipulation on Briefing Schedule and Hearing Date for Non-Party Citadel
4 Securities LLC, Anson Funds Management LP, and Virtu Financial, LLC’s Motion to Quash
5 and/or For a Protective Order, filed herewith (the “[Proposed] Order”), resetting the schedule for
6 briefing and a hearing on the Non-Parties’ Motion to Quash and/or For a Protective Order, ECF
7 No. 2088 *et seq.* (Aug. 5, 2025) (the “Motion”), the schedule for which is currently set forth in the
8 Notice of Hearing on the Motion filed by the Non-Parties, ECF No. 2093 (Aug. 7, 2025) (the
9 “Notice of Hearing”);

10 **WHEREAS**, the Trustee served subpoenas on each of the three Non-Parties seeking
11 production of documents and deposition testimony (the “Subpoenas”);

12 **WHEREAS**, on August 5, 2025, after correspondence and meet and confers, the Non-
13 Parties filed their Motion, seeking to quash the Subpoenas and/or to obtain a protective order with
14 respect thereto;

15 **WHEREAS**, on August 7, 2025, the Non-Parties filed their Notice of Hearing, specifying
16 that “on September 4, 2025 at 10:00 a.m. Pacific Time, a hearing will be conducted” on the Non-
17 Parties’ Motion;

18 **WHEREAS**, the Trustee’s forthcoming opposition to the Non-Parties’ Motion (the
19 “Opposition”) is presently due on Thursday, August 21, 2025, pursuant to Local Rule 9014(d)(1),
20 which provides that “opposition to a motion must be filed, and service of the opposition must be
21 completed on the movant, no later than fourteen (14) days preceding the hearing date for the
22 motion” (as cited in the Notice of Hearing);

23 **WHEREAS**, any reply memorandum filed by the Non-Parties in support of their Motion
24 (the “Reply”) is presently due on Thursday, August 28, 2025, pursuant to Local Rule 9014(d)(2),
25 which provides that “any reply memorandum must be filed and served no later than seven (7) days
26 preceding the hearing date”;

27 **WHEREAS**, counsel for the Trustee has requested to extend the current briefing schedule
28 and hearing date on the Motion, given the current imminent deadline of Thursday, August 21, 2025

1 for the Trustee's Opposition;

2 **WHEREAS**, the Non-Parties agree to the Trustee's request for an extension of the hearing
3 date on the Motion, and necessarily for extended dates to file the Opposition and Reply;

4 **NOW, THEREFORE**, the Parties, through their undersigned counsel, hereby stipulate to
5 and confirm the following:

- 6 1. The remote Zoom hearing on the Motion shall be continued from September 4, 2025
7 to October 30, 2025 at 10:30 a.m.;
- 8 2. Any opposition to the Motion shall be filed and served by September 23, 2025;
- 9 3. Any reply in support of the Motion shall be filed and served no later than October 23,
10 2025; and
- 11 4. The Parties certify that the above requested continuance and modified briefing
12 schedule is made in good faith and not for delay or any other improper purpose.

13 **Date: August 20, 2025**

14

15 *[Signature blocks appear on following page]*

16

17

18

19

20

21

22

23

24

25

26

27

28

1 McDONALD CARANO LLP

2 /s/ Ryan J. Works

3 Ryan J. Works, Esq. (NSBN 9224)

4 Jimmy F. Dahu, Esq. (NSBN 17061)

5 2300 West Sahara Avenue, Suite 1200

6 Las Vegas, NV 89102

7 rworks@mcdonaldcarano.com

8 jdahu@mcdonaldcarano.com

9 QUINN EMANUEL URQUHART & SULLIVAN, LLP

10 Peter H. Fountain, Esq. (admitted *pro hac vice*)

11 Madeleine Zabriskie, Esq. (admitted *pro hac vice*)

12 295 Fifth Avenue

13 New York, NY 10016

14 pterfountain@quinnemanuel.com

15 madeleinezabriskie@quinnemanuel.com

16 **Attorneys for Non-Party Citadel Securities LLC**

17 GREENBERG TRAURIG, LLP

18 /s/ Michael R. Hogue

19 Michael R. Hogue, Esq. (NSBN 12400)

20 10845 Griffith Peak Drive, Suite 600

21 Las Vegas, NV 89135

22 hoguem@gtlaw.com

23 Sylvia E. Simson, Esq. (admitted *pro hac vice*)

24 One Vanderbilt Avenue

25 New York, NY 10017

26 Sylvia.Simson@gtlaw.com

27 Alan J. Brody, Esq. (admitted *pro hac vice*)

28 500 Campus Drive, Suite 400

Florham Park, NJ 07932

brody@gtlaw.com

26 **Attorneys for Non-Party Anson Funds Management LP**

1 SEMENZA RICKARD LAW

2 /s/ Jarrod L. Rickard

3 Jarrod L. Rickard, Esq., (NSBN 10203)
4 10161 Park Run Dr., Ste. 150
5 Las Vegas, NV 89145
6 jlr@semenzarickard.com

7 DAVIS WRIGHT TREMAINE, LLP

8 Michael Rella, Esq. (pro hac vice forthcoming)
9 Shanaye Carvajal, Esq. (pro hac vice forthcoming)
10 1251 Avenue of the Americas
11 New York, NY 10020
12 michaelrella@dwt.com
13 shanayecarvajal@dwt.com

14 **Attorneys for Non-Party Virtu Financial, LLC**

15 HARTMAN & HARTMAN

16 /s/ Jeffrey L. Hartman

17 Jeffrey L. Hartman, Esq. (NSBN 1607)
18 510 West Plumb Lane, Suite B
19 Reno, NV 89509
20 Telephone: (775) 324-2800
21 jlh@bankruptcyreno.com

22 CHRISTIAN ATTAR

23 James W. Christian (admitted *pro hac vice*)
24 1177 West Loop South, Suite 1700
25 Houston, TX 77027
26 Telephone: (713) 659-7617
27 JChristian@christianattarlaw.com

28 SCHNEIDER WALLACE COTTRELL KIM LLP

29 David D. Burnett (admitted *pro hac vice*)
30 1050 30th Street NW
31 Washington, DC 20007
32 Main Line: (415) 421-7100
33 dburnett@schneiderwallace.com

1 ROBINSON SHARP SULLIVAN BRUST
2 Clayton P. Brust (NSBN 5234)
3 71 Washington Street
4 Reno, NV 89503
5 Telephone: (775) 329-3151
6 cbrust@rssblaw.com

7 **Attorneys for Chapter 7 Trustee Christina Lovato**

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28